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To: <nrcprep@nrc.gov>
Date: Thu, Feb 27, 2003 2:25 PM
Subject: Response from "Comment on NRC Documents"

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 68 FR 9708
 (1)

Below is the result of your feedback form. It was submitted by

Mark Hogue (mark.hogue@srs.gov) on Thursday, February 27, 2003 at 14:23:34

Document_Title: NUREG-1767, Environmental Impact Statement on the Construction and Operation of a Mixed Oxide Fuel Fabrication Facility at the Savannah River Site, South Carolina

Comments: The EIS estimates latent cancer fatalities (LCFs) from radiation exposure in a deterministic fashion without regard to any uncertainty in the estimate. Indeed, the estimate for the result of low doses should at least include the possibility of zero effect.

The estimate of LCFs in the draft EIS has already been the subject of media reports and public concern. This is an important issue that must be resolved.

The LCFs currently calculated should be listed as the UPPPER LIMIT of projected LCFs. This should be clearly flagged as applying to the hypothetical situation that doses from high dose and high dose rate radiation exposure can legitimately be used as a predictor of effects of low doses of radiation. The number of LCFs should be expressed as a range that includes zero effect.

This opinion is supported by the Health Physics Society position paper, RADIATION RISK IN PERSPECTIVE, of January 1996, reaffirmed March 2001. The Society of Nuclear Medicine and the American College of Nuclear Medicine voted unanimously to support that position.

The potential for positive health benefits from radiation exposure should be included at least as a note to the LCF discussion. There are ample references for the basis of this point.

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